

1           Zachary L. Ayers  
2           Ayers Law Firm, P.L.L.C.  
3           1312 North Monroe Street, Suite 133  
4           Spokane, Washington 99201  
Telephone: (509) 252-6005

United States District Court  
Eastern District of Washington  
(Honorable Chief Judge Stanley A. Bastian)

United States of America,  
Plaintiff,  
v.  
Jamaal Antwan Pimms,  
Defendant(s).

No. 1:23-CR-02037-SAB-6  
Sentencing Memorandum

Jamaal Antwan Pimms, through counsel, Zachary L. Ayers of Ayers Law Firm, P.L.L.C., respectfully submits this sentencing memorandum.

18 U.S.C. §3553(a)

18 U.S.C. §3553(a) sets out factors that are helpful to the Court when determining a sentence that is “sufficient but not greater than necessary” to comply with the purposes of the statute. The District Court may not presume that the guideline range is reasonable, nor should the guideline factors be given any more or less weight than any other. *United States v. Carty*, 520 F.3d 984, 991 (9<sup>th</sup> Cir. 2008) *en banc*, citing *Rita v. United States*, 127 S.Ct. 2456 (2007), *Gall v. United States*, 127 S.Ct. 2833 (2007), and *Kimbrough v. United States*, 128 S.Ct. 558 (2007). The guidelines are only one factor to be taken into account in arriving at an appropriate sentence. *Id.*

1           Nature of the Offense

2           The nature of this offense is very serious. Mr. Pimms is apologetic to RS and  
3           her family. He recognizes that he should have reported RS's murder to federal  
4           authorities in 2018. RS was a friend of his. He accepts responsibility for his actions  
5           and how they have deeply affected RS's family and her sister.

6           History and Characteristics of the Defendant

7           Mr. Pimms has had a long and significant addiction to controlled substances.  
8  
9           He was heavily addicted to methamphetamine at the time of the offense and has  
10           PSTD and anxiety surrounding RS's death. He has a criminal history score of 1 and is  
11           in history category I. Time in custody has significantly changed Mr. Pimms' outlook on  
12           life and way of speaking, especially now that he has had significant distance from his  
13           drug addiction. He no longer mumbles when he talks and seeks to become a  
14           productive member of society and stay away from controlled substances.

15           To Promote Respect for the Law and To Afford Adequate Deterrence to  
16           Criminal Conduct and Protection of the Public

17           A sentence of time served with a one-year term of supervised release is  
18           sufficient but not more than necessary to promote respect for the law. This sentence  
19           provides Mr. Pimms the opportunity to enter outpatient treatment, become employed  
20           with his father's business, reconnect with his children and distance himself from the  
21           bad influences he had in central Washington.

22           Plan of Action for Mr. Pimms on Supervised Release.

23           If the Court sentences Mr. Pimms to time served, he has undergone a drug  
24           Sentencing Memorandum

1 treatment assessment and is recommended to enter intensive outpatient treatment in  
2 the Auburn, Washington area. He plans to work for his father's business, JCL  
3 Logistics LLC, in Auburn, Washington upon release.  
4

### **Conclusion**

Mr. Pimms respectfully requests the Court to sentence him to time served, a one-year term of supervised release, no fine, and a \$100 special penalty assessment.

9 DATED this 5th day of May 2025.

Respectfully Submitted,

s/Zachary L. Ayers  
Zachary L. Ayers, WSBA#46496  
Attorney for Mr. Pimms.  
Ayers Law Firm, P.L.L.C.  
1312 N. Monroe St., Ste. 133  
Spokane, WA 99201  
Telephone: (509)252-6005  
Email: [zach@ayerslawfirm.net](mailto:zach@ayerslawfirm.net)

## Service Certificate

I hereby certify that on May 5, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Thomas Hanlon, Assistant United States Attorney.

s/Zachary L. Ayers  
Zachary L. Ayers, WSBA#46496  
Attorney for Mr. Pimms.  
Ayers Law Firm, P.L.L.C.  
1312 N. Monroe St., Ste. 133  
Spokane, WA 99201  
Telephone: (509)252-6005  
Email: [zach@ayerslawfirm.net](mailto:zach@ayerslawfirm.net)